

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	
	*	CASE NO. 14-09594 ESL
MARIA TERESA MILIAN HERNANDEZ	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO
REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 59**

TO THE HONORABLE COURT:

COMES NOW, **MARIA TERESA MILIAN HERNANDEZ**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 12, 2016, the Chapter 13 Trustee filed a motion requesting dismissal stating that the debtor was in arrears in the Plan payments in the sum of \$350.00. *Trustee's Motion to Dismiss*, at paragraph 1, docket entry #59.

2. The debtor respectfully replies to the Trustee's motion for dismissal stating that on October 18, 2016 the debtor made a \$200.00 Plan payment to partially cure the aforesated arrears. Attached is copy of *Trustee's Financial Summary Report*, which reflects the above stated Plan payment.

3. Furthermore, the debtor met with the undersigned attorney to discuss the above stated situation and the debtor respectfully states that she is in the process of obtaining the funds to cure the aforementioned balance in the Plan arrears, or the sum of \$150.00.

4. The debtor respectfully understands that she is able to cure the Plan arrears within a reasonable time.

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5. Thus, the debtor needs additional time to obtain the funds to pay the sum of \$150.00 needed to cure the balance in the Plan arrears and adequately reply to the *Trustee's Motion to Dismiss*, docket no. 59.

7. Based on the aforementioned, the debtor needs an extension of time of thirty (30) days within to reply to the *Trustee's Motion to Dismiss*, docket no. 59, in the present case. **This extension of time to expire on December 17, 2016.**

WHEREFORE, debtor, through the undersigned attorney, respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee, Jose R Carrion Morales, Esq., and to all CM/ECF participants; I also certify that a copy of this motion was sent via US Mail to the debtor, Maria Teresa Milian Hernandez, Jardines Cerro Gordo B 30 Calle 5 San Lorenzo PR 00754.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 17th day of November, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR DEBTOR
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FINANCIAL SUMMARY - CASE 14-09594

MARIA TERESA MILIAN HERNANDEZ paying **\$100.00** MONTHLY

Receipts	Rcpts/Deb Refunds	Disbursements	Adjustments	Trustee Disb	Trustee Adj	Show All
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Limits: Select Start Date Select Claim ID Select Payee Name Check Status: Cleared Stale Dated Stop Payment Cancelled Voided Outstanding

Date	Payee	Payee Name	Source / Check	Description	Receipts	Disbursements	Balance
12/22/2014			000000000007950-	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$200.00		
1/29/2015				EPAY-Regular Plan Payment	\$200.00		
2/27/2015				EPAY-Regular Plan Payment	\$200.00		
3/27/2015				EPAY-Regular Plan Payment	\$200.00		
4/30/2015				EPAY-Regular Plan Payment	\$200.00		
6/2/2015				EPAY-Regular Plan Payment	\$200.00		
7/4/2015				EPAY-Regular Plan Payment	\$100.00		
8/28/2015				EPAY-Regular Plan Payment	\$100.00		
10/1/2015				EPAY-Regular Plan Payment	\$100.00		
11/3/2015				EPAY-Regular Plan Payment	\$100.00		
12/3/2015				EPAY-Regular Plan Payment	\$100.00		
12/28/2015				EPAY-Regular Plan Payment	\$100.00		
2/3/2016				EPAY-Regular Plan Payment	\$150.00		
3/3/2016				EPAY-Regular Plan Payment	\$100.00		
4/6/2016				EPAY-Regular Plan Payment	\$100.00		
5/3/2016				EPAY-Regular Plan Payment	\$100.00		
6/16/2016				EPAY-Regular Plan Payment	\$100.00		
8/9/2016				EPAY-Regular Plan Payment	\$100.00		
10/18/2016				EPAY-Regular Plan Payment	\$200.00		
Totals:					\$2,650.00	\$0.00	